

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

U.S. DISTRICT COURT
DISTRICT OF MAINE

2023 AUG 30 A 9:46

DEPUTY CLERK

ZELIA CORREIA

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ROBERT HUTCHISON
Bayview Apartments LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

ZELIA CORREIA

15 PENOBSCOT TEN, APT C

BELFAST / WALDO COUNTY

MAINE 04915

1-207-505-8278

ZELIA6677@hotmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

Defendant No. 1

Name ROBERT HUTCHISON
Job or Title (if known) OWNER of Bayview Apartments LLC
Street Address
City and County AUGUSTA / Kennebec County
State and Zip Code MAINE
Telephone Number 1-207-841-4020
E-mail Address (if known) SAILOR BOB 74 @ gmail . com

Defendant No. 2

Name Bayview Apartments LLC
Job or Title (if known) Complex (Apartment)
Street Address Bayview Apartments PO BOX 195
City and County BATH / Sagadahoc County
State and Zip Code MAINE 04530
Telephone Number 207-389-4416
E-mail Address (if known) DOWNCAST 74 @ gmail . com

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- Fair Housing Act - CIVIL RIGHTS
- HUMAN RIGHTS ACT - FAIR HOUSING INTERFERENCE
- DISCRIMINATION ACT - FOURTH Amendment

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) ZELE - CORRECTIONS, is a citizen of the
State of (name) MAINE

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) ROBERT HUTCHINSON & BAGWELL APARTMENTS, is a citizen of
the State of (name) MAINE. Or is a citizen of
(foreign nation) _____

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

- VIOLATION of CIVIL RIGHTS.
- Discrimination / to Maine Human Rights Commission
- Interference of Fair Housing Act - Discrimination
- To make the plaintiff whole as described
- Fair Housing Act violation

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

At Bayview Apartments / to owner RUSSELL HUTCHISON
 Interfered w/ civil rights / Fair Housing Act / Discrimination
 against plaintiff - HUTCHISON attempted to make the plaintiff
 homeless / non-repairs / Maine Human Rights Act /
 contract breach / warranty violations / Bayview Apartments to make unit
 to plaintiff / Discrimination. See Documents Attached

B. What date and approximate time did the events giving rise to your claim(s) occur?

- See Decision of the Maine Human Rights Commission
- See Maine Housing Interference to illegally live in the building
- Fair Housing Interference - July 2020, Nov 2021, Oct 2023.
- 2018-2023 Human Rights Act / Fair Housing Act / Discrimination
- See Attached Documents / Statements

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

- Robert Hutchison & Bayview Apartments have attempted to hurt the plaintiff & legally by interfering with Fair Housing Accommodations & Act. Was dismissed for ~~Human Rights~~ the main Human Rights Commission. Dismissed violated civil rights by turning Bayview Apt. to market value. Then attempted to cause harm to the disabled plaintiff. Gmely has
- ~~related to disabilities Act~~ * contract breach 2018-2022-2023
- ~~violated to breach~~ * warrant breach 2018-2023

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

- physical & emotional ~~trauma~~ ^{traumatizing} the plaintiff by discriminating and attempting to illegally hurt the plaintiff / plaintiff / wife / mother to hate from the defendants. This is saved to plaintiff in life, knowing the defendants tried to include the disabled plaintiff.
- see attachments documents / statements

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Robert Hutchison - Civil Rights 1.8 million dollars
 - Fair Housing criminal interference 2 million dollars
 - Fourth Amendment Rights 1.5 million dollars
 - Disabilities Accommodations 1.5 million dollars
 - Breach of Contract 100 thousand dollars
 Total 6.8 million / 100 thousand dollars

Bayview Apartments - Civil Rights 1.8 million dollars
 - Fair Housing criminal interference 2 million dollars
 - Fourth Amendment Rights 1.5 million dollars
 - Disabilities Act 1.5 million
 - Disabilities Act 100 thousand dollars
 Total 6.8 million / 100 thousand dollars

+ See attached documents.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: August 30, 2023

Signature of Plaintiff

Printed Name of Plaintiff

ZELIA M. CORREIA

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address